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July 18, 2016

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
For the District of New Jersey
Rev. Dr. Martin Luther King Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Spellman v. Express Dynamics, LLC*
Civil Action No. 15-3257 (WHW)(CLW)

Dear Judge Waldor:

This firm represents Plaintiff Raymond Spellman. On June 3, 2016, in response to the parties' written request (DE 34), the Court rescheduled the In-Person Settlement Conference ("Settlement Conference") for July 26, 2016. (See DE 35.) The reason for that request was that the parties believed that some additional discovery before the Settlement Conference would make it more productive. Since June 3, certain discovery disputes have arisen, which the parties have been attempting in good faith to resolve in accordance with paragraph 9 of the Pretrial Scheduling Order. (See DE 32, ¶ 9.) Because there is a strong possibility that the parties may seek relief from the Court in order to resolve certain discovery issues, we believe that the July 26, 2016, Settlement Conference should be rescheduled in order to make it as productive as possible. The parties suggest rescheduling the Settlement Conference for a time certain after the disposition of the imminent discovery disputes. Should the parties resolve their outstanding discovery disputes without Court intervention, the parties will notify the Court to schedule a Settlement Conference.

Thank you in advance for your consideration of this request.

Very truly yours,

s/Christopher J. Dalton

Christopher J. Dalton
BUCHANAN INGERSOLL & ROONEY
A PROFESSIONAL CORPORATION

cc: Amanda J. Lavis, Esq. (via ECF)